

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA**

ROCKDALE COUNTY,

Plaintiff,

v.

BIO-LAB INC., et al.,

Defendants.

C. A. No. 1:24-cv-04916-SEG

JURY TRIAL DEMANDED

[PROPOSED] SCHEDULING ORDER

Pursuant to this Court's February 5, 2025 Order [Doc. 41] directing the parties to file their joint schedule or separate proposals by February 12, 2025, Plaintiff and Defendants Bio-Lab, Inc., KIK International, LLC, and KIK Custom Products, Inc., (collectively, the "Bio-Lab and KIK Defendants") hereby file their proposed Scheduling Order. Accordingly, Plaintiff and the Bio-Lab and KIK Defendants propose that the case proceed pursuant to the following dates and deadlines:

ACTION	DEADLINE
Motion to Dismiss	Monday, Feb. 24, 2025
Response to MTD	Monday, March 24, 2025 (4 weeks)
Reply to MTD	Monday, April 14, 2025 (3 weeks)
Rule 26(f) Early Planning Conference	March 12, 2025 (16 days from MTD)
Joint Preliminary Report & Discovery Plan	Wednesday, March 26, 2025 (30 days from MTD)

ACTION	DEADLINE
First Day to Serve Initial Document Requests	Wednesday, March 26, 2025 (30 days from MTD)
Deadline to submit confidentiality order and ESI protocol	Wednesday, March 26, 2025
Rule 26(a)(1) Initial Disclosures	Wednesday, March 26, 2025 (30 days from MTD)
Responses and Objections to Initial Document Requests	May 12, 2025 (45 days from service of requests)
Rolling Production in Response to Initial Document Requests Begins	June 16, 2025
Answer to Complaint	30 days following decision on MTD
Discovery other than Requests for Production opens	14 days following Answer
Discovery Disputes	Pursuant to Standing Order IV(I)
Written Fact Discovery Substantially Complete	Six months following commencement of discovery
Initial Fact Discovery Cutoff	Friday, January 16, 2026
Expert Disclosure	Friday, February 27, 2026
Rebuttal Expert Disclosure	Friday, March 27, 2026
Expert Depos Complete	Friday, May 8, 2026
In Person Conference after Discovery	Within 14 days of close of discovery
Daubert Motions	Friday, June 12, 2026
Daubert Response	4 weeks after motion is filed and served
Daubert Reply	4 weeks after response is filed and served

ACTION	DEADLINE
Motion for Summary Judgment	60 days after order on class cert. in the case of In Re Bio-Lab Class Actions, Case No. 1:24-cv-04407-SEG)
Response to MSJ	30 days after motion is filed and served
Reply To MSJ	21 days after opposition is filed and served
Proposed Consolidated PTO	30 days after Court's order on MSJ ¹

Dated: February 12, 2025

/s/ Michael A. Caplan

Michael A. Caplan (GA # 601039)
Michael L. Eber (GA # 859338)
Jessica Arnold Caleb (GA # 141507)
Emily C. Snow (GA # 837411)
CAPLAN COBB LLC
75 Fourteenth Street NE, Suite 2700
Atlanta GA 30309
Tel. (404) 596-5600
mcaplan@caplancobb.com
meber@caplancobb.com
jarnold@caplancobb.com
esnow@caplancobb.com

/s/ Alan E. Schoenfeld

Alan E. Schoenfeld
(Admitted Pro Hac Vice)
**WILMER CUTLER PICKERING
HALE AND DORR LLP**
7 World Trade Center
250 Greenwich Street
New York NY 10007
Tel. (212) 230-8800

Respectfully submitted,

/s/ Mirza Qader Ali Baig

Mirza Qader Ali Baig (GA # 031610)
**M. QADER A. BAIG &
ASSOCIATES, LLC**
913 Commercial Street NE, Suite B
Conyers GA 30012-4537
Tel. (770) 929-1665
mqab@mqablalaw.com

/s/ Shayna E. Sacks

Shayna E. Sacks
(Admitted Pro Hac Vice)
NAPOLI SHKOLNIK PLLC
360 Lexington Avenue, Floor 11
New York NY 10017-6502
Tel. (212) 397-1000
ssacks@napolilaw.com

Hunter J. Shkolnik

(Admitted Pro Hac Vice)

Paul J. Napoli

(Admitted Pro Hac Vice)

Veronica N. Vazquez Santiago

(Admitted Pro Hac Vice)

¹ The parties have endeavored to propose reasonable dates that move the case forward expeditiously but reserve the right to seek modification of the proposed dates as the case progresses, including to allow sufficient time for resolution of any initial Rule 12 motions.

alan.schoenfeld@wilmerhale.com

Felicia H. Ellsworth

(Admitted Pro Hac Vice)

WILMER CUTLER PICKERING

HALE AND DORR LLP

60 State Street

Boston MA 02109

Tel. (617) 526-6000

felicia.ellsworth@wilmerhale.com

Counsel for Defendants

NS PR LAW SERVICES LLC

1302 Avenida Ponce de León

San Juan PR 00907-3982

Tel. (833) 271-4502

hunter@nsprlaw.com

pnapoli@nsprlaw.com

vvazquez@nsprlaw.com

Counsel for Plaintiff

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1

The undersigned hereby certifies that the foregoing document has been prepared in accordance with the font type and margin requirements of Local Rule 5.1 of the Northern District of Georgia, allowing the font type of Book Antiqua and point size of 13.

/s/ Shayna E. Sacks
Shayna E. Sacks

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing document was served on all parties who have appeared in this case on February 12, 2025 via the Court's CM/ECF system.

/s/ Shayna E. Sacks
Shayna E. Sacks